

To the Secretary of Agriculture
Subject Rule # TMD-94-00-2

Secretary Glickman:

I am a concerned consumer writing in response to the National Organic Rule #TMD-94-00-2. I have researched the qualifications for the highest standards of organic growers and have come to trust private certifiers such as Demeter, OCIA, NOFA and Oregon Tilth. These and others have set standards for organics that farmers, producers and consumers can trust. The USDA has not followed their good example. By disregarding the Organic Standards Boards recommendations, you have ignored the best informed sources for preserving true Organic labeling in this country. I ask you to follow the NOSB's recommendations as Congress intended.

- 1.) Adhere to the NOSB National List recommendations 205.200-205.28. The USDA has no right to redefine terminology such as active/nonactive thus creating other criteria for approved substances in organic production.
- 2.) Keep unwanted materials out of organic production - genetically engineered organisms and their products are synthetic and their long-term effect on the environment and human health has not been adequately researched. They should not be labeled organic. Sewage sludge, biosolids, and ionizing radiation are equally unacceptable and will place U.S. standards in conflict with existing industry practice internationally. Sections (205.2, 205.8, 205.9, 205.22, 205.26, 205.17)
- 3.) The flat fees for certification and registration will destroy the small farmers and producers and give unfair advantage to well-capitalized growers and producers. Use the sliding fee system as recommended by the NOSB. Section (205.421-205.425)
- 4.) Maintain the highest standards for feeding, caring, and housing livestock. 100% organic feed, no feed containing animal parts (rendering) and manure. Follow the recommendations of NOSB. (Section 205.13-205.15)
- 5.) Respect Freedom of Speech - The USDA has no right to restrict other labeling, i.e., IPM, ecological, etc. Stick to organic as the law OFPA requires. (Section 205.103) Private certifiers representing standards that exceed USDA standards must be allowed to state their superior quality. (Section 205.301)

The members of the Organic Standards Board (appointed by Congress) are the experts in the organic industry. Please adhere to the recommendations for the rules as set forth by the Organic Standards Board --- in their entirety.

Sincerely,

PRINT NAME _____